

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

SHIRLEY BRADFORD, §  
Plaintiff/Counter-Defendant, §  
§  
§  
§  
v. § Civil Action No.4:15-cv-2162  
§  
§  
§  
FEDERAL NATIONAL MORTGAGE §  
ASSOCIATION AND SETERUS, INC., §  
Defendants/Counter-Plaintiffs. §

**DECLARATION OF PHILIP W. DANAHER**

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the following statements are true and correct:

1. "My name is Philip W. Danaher. I am over the age of 21 years and am fully competent to make this Declaration. All statements of fact made herein are true, correct, and within my personal knowledge.

2. I am an attorney for Defendants/Counter-Plaintiffs Federal National Mortgage Association and Seterus, Inc. ("Defendants").

1. Plaintiff filed her Original Petition against Defendants on May 28, 2015, in the 333<sup>rd</sup> Judicial District Court of Harris County, Texas, Cause No. 2015-30624.

2. Defendants filed their Notice of Removal to Federal Court on July 28, 2015. (ECF Document No. 1.)

3. Defendants filed their Original Counterclaim on July 28, 2015. (ECF Document No. 3.) and served said counterclaim on counsel for Plaintiff by ECF notification on the same date.

4. Plaintiff's answer or other response to the Original Counterclaim was due on or before August 11, 2015. FED. R. CIV. P. 12(a)(1)(A)(i).

4. I further certify that Plaintiff has failed to serve an answer or other responsive pleading; no extension has been granted or any extension has expired; and Plaintiff is not an infant (under age 21) or incompetent person.

5. Defendants and the undersigned have determined that Plaintiff Shirley Bradford is not in the military services. Attached as Exhibit A-1 is a Military Status Report provided by the Defense Manpower Data Center (DMDC) website pursuant to the Service Members Civil Relief Act, 50 U.S.C. App. 521, § 201.

FURTHER DECLARANT SAYETH NOT."

Signed this 14<sup>th</sup> day of January, 2016.



PHILIP W. DANAHER

## **EXHIBIT A-1**



**Status Report**  
**Pursuant to Servicemembers Civil Relief Act**

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*Mary M. Brady-Dixon*

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